

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

RAMONA THURMAN BIVINS,

Plaintiff,

v.

FELICIA FRANKLIN, in her
individual and official capacities;
ALIEKA ANDERSON, in her
individual and official capacities;
GAIL HAMBRICK, in her
individual and official capacities;
and CLAYTON COUNTY,
GEORGIA,

Defendants.

Civil Action Number:
1:22-cv-04149-WMF

**DEFENDANT FELICIA FRANKLIN’S CONSENT MOTION TO EXTEND
THE DEADLINE TO ANSWER, PLEAD, OR OTHERWISE RESPOND TO
PLAINTIFF’S COMPLAINT**

COMES NOW Defendant Felicia Franklin (“Defendant Franklin”) by and through her undersigned counsel and, pursuant to Fed. R. Civ. P. (6)(b), hereby moves for an extension of time to respond to Plaintiff’s Complaint, seeking an extension of this deadline through and including December 12, 2022. In support of this motion, Defendant Franklin respectfully show as follows:

Defendant Franklin's answer or responsive pleading is currently due on November 22, 2022. The request for an extension to December 12, 2022, is needed due to the upcoming Thanksgiving holiday and the fact that undersigned counsel was only just retained to represent Defendant Franklin. Counsel needs additional time to evaluate Plaintiff's claims and prepare responsive pleadings. Counsel for Defendant Franklin has conferred with Plaintiff's counsel, and Plaintiff consents to Defendant Franklin's request for this extension.

WHEREFORE, Defendant Franklin respectfully requests that she be granted an extension through and including December 12, 2022 to answer, plead, or otherwise respond to Plaintiff's Complaint. All defenses are hereby reserved. A proposed order is attached for the Court's convenience.

Respectfully submitted this 17th day of November, 2022.

/s/ Ken E. Jarrard
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Franklin*

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CERTIFICATE OF COMPLIANCE

I hereby certify that the within and foregoing has been prepared in compliance with Local Rule 5.1(B) in 14-point Times New Roman type face.

/s/ Ken E. Jarrard
Ken E. Jarrard
Georgia Bar No. 389550
kjarrard@jarrard-davis.com

CERTIFICATE OF SERVICE

I hereby certify that I have this date electronically filed the foregoing **CONSENT MOTION TO EXTEND THE DEADLINE TO ANSWER, PLEAD, OR OTHERWISE RESPOND TO PLAINTIFF’S COMPLAINT** in the above-styled civil action with the Clerk of Court by using the Court’s CM/ECF system, which will automatically send notice of same to the attorneys of record.

This 17th day of November, 2022.

/s/ Ken E. Jarrard
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